

November 9, 2017

The Honorable Peter Benjamin  
Town of Garrett Park  
4600 Waverly Avenue  
P.O. Box 84  
Garret Park, MD 20896

Re: Safe Routes to School Project – Garrett Park  
Montgomery County, MD

Dear Mayor Benjamin:

Thank you for providing the Maryland Historical Trust (Trust) with additional information for the above-referenced project. The Trust previously commented on the proposed undertaking in November 2013 and August 2016. Your project submittal represents ongoing consultation in accordance with Section 106 of the National Historic Preservation Act and the Maryland Historical Trust Act of 1985, as appropriate.

The Trust received numerous letters and email messages from interested residents sharing their views of the project. We appreciate the thoughtful and informed remarks offered by the consulting parties and we have taken these comments into consideration during our review of the Town's recent project submittal. The Town's project submittal includes updated project documentation, 65% complete plans and storm water management proposal. We also appreciate receiving a thorough discussion of the project's purpose and need, alternatives and public outreach. We are writing to provide comments regarding the project's impact on historic properties, including archeological resources.

The Town of Garrett Park (Town) is proposing to use federal funds under the Safe Routes to School (SRTS) program to improve access to the Garrett Park Elementary School. Town officials have chosen to proceed with the design and construction of sidewalks, curbs, ADA ramps, driveway crossings, crosswalks and signage along portions of Oxford Street, Kenilworth Avenue, Montrose Avenue and Clermont Avenue. A storm water management component has been added to the project along Clermont Avenue in Porcupine Woods Park to fulfill local requirements. This is the undertaking defined and advanced by the Town and addressed by the Trust in the following comments.

As noted in the Trust's previous correspondence, the proposed sidewalk construction activities will occur within the Garrett Park Historic District (MIHP No. M: 30-13), which was listed in the National Register of Historic Places in 1975. The district contains an assortment of well-preserved and representative architectural styles constructed between the 1890s to the mid-twentieth century within a planned landscape. The buildings, roadway pattern and lush mature landscape all contribute to the historic significance of the community.

The Trust has assessed and considered the archeological potential of the project area. It is the Trust's opinion that given the environmental setting and prior disturbance, the project area is unlikely to contain intact archeological resources eligible for listing in the National Register of Historic Places. Therefore, archeological investigations for this undertaking are not warranted.

The Town's project submittal demonstrates a desire to address a community-identified safety concern while considering the important aspects of the historic district. We realize that changes to historic properties are sometimes necessary to address modern needs and the Secretary of the Interior's Standards for the Treatment of Historic Properties allows for alterations and additions to accommodate efficient contemporary uses. It is important that these modifications are compatible with the physical character and historic context of the neighborhood.

Since the initiation of project planning activities, several measures have been adopted by the Town to minimize the potential impact of the proposed sidewalks on the character of the historic district. We appreciate that the current sidewalk design utilizes gentle curves, minimal width, tinted concrete, rolled concrete curbs and nominal disturbance to vegetation. We believe that these context-sensitive activities could enhance the safe use and enjoyment of the district without substantive impacts on the overall integrity of the Town's primary historic characteristics.

There is a precedent for sidewalk construction within the community. Other streets within the historic district, such as Montrose Avenue and Clermont Avenue, already possess asphalt walkways that this project will replace. We believe that the context-sensitive replacement of these walkways will not cause adverse effects. The introduction of new sidewalks along Kenilworth Avenue will have minimal impact to the community. The roadway alignment will remain unchanged and much of the sidewalk route is already graded to accommodate a walkway. Furthermore, the addition of sidewalks along Oxford Street is compatible with the grid street pattern of this section of the community. As previously noted, the project's storm water management component includes the stabilization of a severely eroded water outfall in Porcupine Woods Park. This much-needed improvement will prevent further erosion and destruction of private property and community parkland.

The current proposal affects the overall Garrett Park Historic District. However, it is the Trust's opinion that the current project design is compatible with the historic nature of the community. We believe that it does not diminish the major character-defining features of the roadway, landscape or built environment and does not alter the characteristics of the overall historic district that qualify it for listing in the National Register of Historic Places, per 36 CFR 800.5(a)(1). The Garrett Park Historic District will continue to convey its sylvan late 19<sup>th</sup> and early 20<sup>th</sup> century appearance while offering safe pedestrian movement for all of its population and guests. Therefore, it is the Trust's opinion that the overall project will have no adverse effect on historic properties.

We request the opportunity to review the 90% complete plans and inspect material samples when available. As project plans are further developed, please continue to incorporate the following context-sensitive components:

- Tinted concrete sidewalk, curb, gutters and driveway aprons;
- Curvilinear alignment of walkway to follow roadway alignment, fit topography and avoid vegetation;
- Minimize width of sidewalk (generally 3-4' with areas of 5' wide refuge) while meeting ADA requirements;
- Rolled or mountable concrete curbs;
- Tree root bridges and minimization of tree removal (only five trees will be removed);
- Planting of additional trees and relocation of existing trees/shrubbery, when feasible;
- When tying the new sidewalk/apron into existing driveways, the current driveway materials (i.e. asphalt, concrete, etc.) will be utilized.

The Trust was asked to comment on the historic status of the residence located at 10919 Clermont Avenue. The property, constructed in the 1920s, is located within the National Register-listed historic boundary for the Garrett Park Historic District. Although enlarged over time, this "Chevy House" retains its materials, form, massing, location, feeling and association. Therefore, it is the Trust's opinion that the property contributes to the significance of the Garrett Park Historic District.

We look forward to the ongoing review of the project plans and the sample materials. Please share this correspondence with the numerous Section 106 consulting parties and the community at large. If you have questions or require further assistance, please contact Beth Cole (for archeology) at [beth.cole@maryland.gov](mailto:beth.cole@maryland.gov) or Tim Tamburrino (for the historic built environment) at [tim.tamburrino@maryland.gov](mailto:tim.tamburrino@maryland.gov).

Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes  
Director/State Historic Preservation Officer

EH/EJC/TJT 201705513

Cc: Phillip Estes (Montgomery County HPC)  
Jeanette Mar (FHWA)  
Caryn Brookman (SHA)  
Jessica Silwick (SHA)  
Julie Schablitsky (SHA)